

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN DOE,

Plaintiff,

-against-

TRUSTEES OF BOSTON COLLEGE,

Defendants.

Civil Action No:

**DECLARATION OF TARA J. DAVIS, ESQ. IN SUPPORT OF
PLAINTIFF JOHN DOE'S MOTION FOR A TEMPORARY
RESTRAINING ORDER AND A PRELIMINARY INJUNCTION**

TARA J. DAVIS, ESQ. hereby declares subject to the penalties of perjury pursuant to 28 U.S.C.

§ 1746:

1. I am admitted to practice in the courts of the State of Massachusetts and am a member of the Bar of the District Court of Massachusetts. I am a member of the law firm of Nesenoff & Miltenberg LLP, attorneys for Plaintiff John Doe (“Plaintiff”).

2. I submit this Declaration in support of Plaintiff's motion for a temporary restraining order and a preliminary injunction. Accompanying this Declaration is Plaintiff's Complaint alleging causes of action for violations of Title IX of the Education Amendments of 1972, breach of contract, breach of contract/common law basic fairness, and other state law causes of action, Plaintiff's Memorandum of Law in support of Plaintiff's motion for a temporary restraining order and preliminary injunction, and Plaintiff's Declaration in support of Plaintiff's motion for a temporary restraining order and preliminary injunction.

3. I submit this Declaration to submit certain documents from the disciplinary case at Boston College into the motion record before this Court.

4. Attached as Exhibit A is a copy of Boston College's Student Sexual Misconduct Policy 2018-2019.

5. Attached as Exhibit B is a copy of Boston College's 2018-2019 Code of Student Conduct.

6. Attached as Exhibit C is a copy of the January 23, 2019 Notice to Appear.

7. Attached as Exhibit D is a copy of Doe's April 18, 2019 Response to the Evidence File.

8. Attached as Exhibit E is a copy of the June 18, 2019 Resolution Letter.

9. Attached as Exhibit F is a copy of Doe's June 27, 2019 Appeal.

10. Attached as Exhibit G is a copy of the July 24, 2019 Appeal Decision.

WHEREFORE, the Court should grant Plaintiff's application in its entirety, and should order such further and other relief as the Court deems just and proper.

I declare under the penalty of perjury that the foregoing is true and correct, pursuant to Title 28, United States Code, Section 1746.

Dated: Boston, Massachusetts
July 29, 2019

/s/ Tara J. Davis
Tara J. Davis
BBO # 675346